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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
COMMERCIAL RADIO SERVICE, INC.) **EB DOCKET NO. 06-168**
)
Licensee of Private Land Mobile Stations) File No. EB-06-IH-1362
WNDS861, Reelsville, Indiana; WNIL729,)
Paxton, Indiana; WPCJ772, West Terre Haute,) NAL Acct. No. 200632080166
Indiana; and WPNU312 Greencastle,)
Indiana/West Terre Haute, Indiana)
)
Licensee of Commercial Land Mobile Station)
WNGE348, West Terre Haute, Indiana)
)
TIMOTHY M. DOTY)
)
Licensee of General Radiotelephone Operator)
License PG1814366; and Amateur Radio)
Operator and Licensee of Amateur Radio)
Station WB9MDC, West Terre Haute, Indiana)

To: Commercial Radio Service, Inc.

ENFORCEMENT BUREAU'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

The Enforcement Bureau ("Bureau"), pursuant to Section 1.325 of the Commission's Rules, 47 C.F.R. § 1.325, hereby requests that Commercial Radio Service, Inc. ("CRS") produce the documents specified herein for inspection and copying. Production shall be made at the offices of the Investigations and Hearings Division, Enforcement Bureau, Federal Communications Commission, Suite 4-C330, 445 12th Street, S.W., Washington, DC 20554 (or at some other location that is mutually acceptable to the Bureau and CRS) within 10 days of the date of this request.

Definitions and Instructions

a. “CRS” means Commercial Radio Service, Inc., any affiliate, d/b/a, predecessor-in-interest, parent company, wholly or partially owned subsidiary, successor-in-interest or other affiliated company or business, and all directors, officers, employees, shareholders or agents, including consultants and any other persons working for or on behalf of any of the foregoing during the period January 1, 1990 through the present.

b. “Document” means the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, videotaped, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made, including but not limited to any book, pamphlet, periodical, contract, agreement, correspondence, letter, facsimile, e-mail, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, photograph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minutes, marketing plan, research paper, personnel file, personnel folder, preliminary drafts, or versions of all of the above, and computer material (print-outs, cards, magnetic or electronic tapes, disks and such codes or instructions as will transform such computer materials into easily understandable form) in the possession, custody, or control of CRS.

c. “Relate to” and “relating to” mean constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, concerns or in any way is pertinent to the specified subject, including documents concerning the preparation of the documents.

- d. “All” shall be construed to include the word “any.”
- e. Each Document produced shall be identified by the number of the Document request to which it is responsive, and each Document shall be produced in its entirety, even if only a portion of that Document is responsive to a request herein. This means that the Document shall not be edited, cut, or expunged, and shall include all appendices, tables, or other attachments, and all other Documents referred to in the Document or attachments. All written materials necessary to understand any Document responsive to these inquiries must also be produced.
- f. If a Document responsive to any request herein existed but is no longer or not currently available, or if CRS is unable for any reason to produce a Document responsive to any request, each such Document shall be identified by author, recipient, date, title, and specific subject matter, and a full explanation shall be provided why the Document is no longer available or why CRS is otherwise unable to produce it.
- g. If any Document produced in response to any request herein is not dated, the date on which the Document was prepared shall be provided. If any Document does not identify its author(s) or recipient(s), the name(s) of the author(s) or recipient(s) of the Document shall be provided.
- h. This request is continuing in nature, requiring immediate production if a further or different Document responsive to any request herein comes into the possession, custody, or control of CRS during the pendency of this proceeding.
- i. If production of any Document responsive to any request herein called for by this request is refused pursuant to a claim of privilege, the Document shall be identified by reference to its author, recipient(s) (including any person receiving a copy,

regardless of whether that recipient is listed on the Document), date, and subject matter. The basis for the privilege claimed for such Document shall be specified with sufficient precision to permit assessment of the applicability of the privilege involved.

Documents Requested

1. All formation and organizational Documents relating to CRS, including, but not limited to, articles of incorporation, by laws, minutes, agreements, voting rights, proxies, and any and all amendments thereto.
2. All Documents relating to Case No. TH-91-4-CR-01, in which Timothy M. Doty was found guilty in United States District Court for the Southern District of Indiana, Terre Haute Division, of having violated 18 U.S.C. § 2512(1)(b), involving the manufacture, assembly, and possession of Video Cipher II satellite television descramblers which were modified to receive subscription television channels at no cost and without authorization, a felony.
3. All Documents relating to Cause No. 84D05-0007-DF-01169, in which Timothy M. Doty was found guilty in State of Indiana, Vigo Superior Court, Division 5, of having violated Indiana Code § 35-48-4-7(a), involving possession of a controlled substance (methamphetamine), a felony.
4. All Documents relating to and/or evidencing Gary C. Doty's knowledge of each of the felony convictions of Timothy M. Doty.
5. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 600 (Application for Mobile Radio Service Authorization) filed on March 1, 1999, with the Commission by or on behalf of CRS for a new station, File No. D122642, and any amendments thereto.

6. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on September 29, 2000, with the Commission by or on behalf of CRS for modifications of Station WNGE348, File No. 253365, and any amendments thereto.

7. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on July 8, 2003, with the Commission by or on behalf of CRS for renewal-only of the license for Station WNIL729, File No. 1375615, and any amendments thereto.

8. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on November 24, 2003, with the Commission by or on behalf of CRS for renewal-only of the license for Station WPCJ772, File No. 1524776, and any amendments thereto.

9. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on May 18, 2004, with the Commission by or on behalf of CRS for renewal-only of the license for Station WPNU312, File No. 1740183, and any amendments thereto.

10. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on March 4, 2005, with the Commission by or

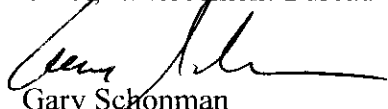
on behalf of CRS for renewal-only of the license for Station WNGE348, File No. 2067489, and any amendments thereto.


11. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on September 15, 2005, with the Commission by or on behalf of CRS for renewal-only of the license for Station WNDS861, File No. 2316369, and any amendments thereto.

12. All Documents relating to Federal income tax returns filed by or on behalf of CRS from January 1, 1990, to the present.

13. All Documents relating to the planning, preparation, review and filing of the application on FCC Form 601 (FCC Application for Wireless Telecommunications Bureau Radio Service Authorization), filed on February 26, 2003, with the Commission by or on behalf of Gary A. Doty for renewal-only of the license for Station KST762, File No. 1211478, and any amendments thereto.

Respectfully submitted,
Kris Anne Monteith
Chief, Enforcement Bureau


Gary Schonman
Special Counsel, Investigations and Hearings Division


William Knowles-Kellett
Attorney, Investigations and Hearings Division

Federal Communications Commission
445 12th Street, S.W., Room 4-C330
Washington, D.C. 20554
(202) 418-1420

September 22, 2006

CERTIFICATE OF SERVICE

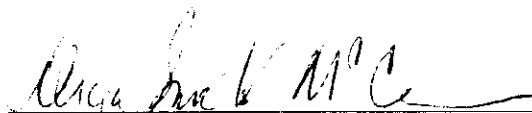
Alicia McCannon, an Industry Analyst in the Enforcement Bureau's Investigations and Hearings Division, certifies that she has, on this 22nd day of September, 2006, sent by first class United States mail copies of the foregoing "Enforcement Bureau's First Request for Production of Documents" to:

Elizabeth R. Sachs, Esq.
Russell D. Lukas, Esq.
Lukas, Nace, Gutierrez & Sachs, Chartered
1650 Tysons Boulevard, Suite 1500
McLean, Virginia 22102
Counsel for Commercial Radio Service, Inc.

Commercial Radio Service, Inc.
915 S. Prospect Street
Terre Haute, Indiana 47802

Timothy M. Doty
915 S. Prospect Street
Terre Haute, Indiana 47802

Administrative Law Judge Arthur I. Steinberg*
Federal Communications Commission
445 12th Street, S.W., Room 1-C861
Washington, D.C. 20054


Alicia McCannon

* Hand-Delivered